

*Before the*  
**Federal Communications Commission**  
**Washington, DC 20554**

In the Matter of	)	
	)	
Cross-Ownership of Broadcast Stations	)	MM Docket No. 01-235
and Newspaper	)	
	)	
Newspaper/Radio Cross-Ownership	)	MM Docket No. 96-197
Waiver Policy	)	

**MOTION FOR ACCEPTANCE OF LATE-FILED COMMENTS**

The American Federation of Labor and Congress of Industrial Organizations (AFL-CIO) respectfully moves for acceptance of late-filed comments prepared for submission in this proceeding. A copy of the AFL-CIO's comments have been electronically filed contemporaneously with the submission of this motion.

These comments are being submitted one day after the formal comment deadline. Given the large volume of comments which have already been filed in this important matter, it will take a considerable period of time to review the record, so affected parties will not be delayed by the late submission of this pleading. Inasmuch as the AFL-CIO represents the interests of 13 million working Americans and their families, who seek to exercise their first amendment rights to organize and to participate in the democratic process, the benefit of receiving its viewpoint far outweighs any possible inconvenience caused by the slight delay in their submission.

WHEREFORE, the AFL-CIO asks that its comments dated December 4, 2001 be accepted for filing, and that the Commission grant all such other relief as may be proper.

Respectfully submitted,

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